

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

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S.D. OF N.Y.

JURISDICTION

D. GEORGE SWEIGERT,

Plaintiff-Counter Defendant,

vs.

JASON GOODMAN,

Defendant-Counterclaimant

Case No.: 1:18-cv-08653-UA

COUNTERCLAIM TO AMENDED COMPLAINT

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Defendant-Counterclaimant Jason Goodman alleges as follows. Plaintiff-Counter Defendant Sweigert is part of and participant in an organized defamation, slander, harassment, cyber stalking, and actual stalking campaign (The Campaign) against Defendant-Counterclaimant Goodman. The Campaign involves spreading known false defamatory information about Goodman, willfully and with the wanton malicious intent to damage Goodman's reputation and business in a public worldwide forum. These actions were taken in concert with a group of individuals who acted against Goodman for the purpose of wanton and willful tortious interference, defamation, slander, harassment, invasion of privacy, infringement of first amendment rights, menacing and stalking both online and in the real world. As a result of Sweigert and his co-conspirators' willful and wanton actions, Defendant Counter Claimant Goodman has been damaged financially and has suffered mental and emotional distress and loss of enjoyment of life.

Defendant-Counter Claimant Jason Goodman prays that the Court will enter judgment in his favor on all issues and award Defendant-Counter Claimant Goodman an appropriate amount of compensatory damages and an appropriate award of punitive or exemplary damages to punish the Plaintiff-Counter Defendant Sweigert for his reckless, willful and wanton conduct and to deter such reckless, willful, and wanton conduct in the future and for an award for all costs associated with this action, court costs, and such other relief as is just and equitable.

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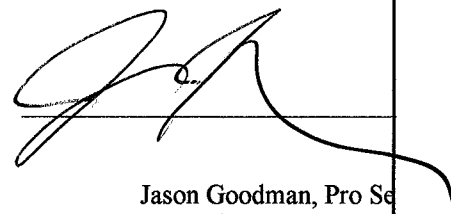
**JURY DEMAND**

Defendant demands trial by jury on all issues so triable.

**VERIFICATION**

I affirm under penalty of perjury that the statements made herein are true and correct to the best of my information, knowledge, and belief.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'J. Goodman', is written over a horizontal line.

Jason Goodman, Pro Se  
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